

GILBERT & ENGLAND LAW FIRM  
610 SOUTH NINTH STREET  
LAS VEGAS, NEVADA 89101  
(702) 529-2311

Kathleen J. England, NV Bar #206  
**GILBERT & ENGLAND LAW FIRM**  
610 South Ninth Street  
Las Vegas, Nevada 89101  
Phone: 702.529.2311  
E-mail: [kengland@gilbertenglandlaw.com](mailto:kengland@gilbertenglandlaw.com)

*Attorneys for Plaintiff, Alexis Gurshin*

Bethany A. Pelliconi, (admitted *pro hac vice*)  
California Bar No. 182920  
Lindsay L. Ryan, (admitted *pro hac vice*)  
California Bar No. 258130  
**MCGUIREWOODS LLP**  
1800 Century Park East, 8<sup>th</sup> Floor  
Los Angeles, CA 90067-1501  
Phone: 310.315.8200; Fax: 310.315.8210  
[bpelliconi@mcguirewoods.com](mailto:bpelliconi@mcguirewoods.com)  
[lryan@mcguirewoods.com](mailto:lryan@mcguirewoods.com)

*Attorneys for Defendant, Bank of America, N.A.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Case No.: 2:15-cv-00323-GMN-VCF

ALEXIS GURSHIN, Plaintiff,

v.

BANK OF AMERICA, NATIONAL  
ASSOCIATION; DOES I through X, and  
ROE BUSINESS ENTITIES I through X,  
inclusive, Defendant.

**JOINT STIPULATION TO EXTEND  
PARTIES' DEADLINES TO RESPOND  
TO PARTIES' RESPECTIVE  
OBJECTIONS TO MAGISTRATE  
JUDGE'S ORDER ON MOTION TO  
DEEM REQUESTS ADMITTED [DKT.  
# 130] UNDER FED. R. CIV. P. 72(A)  
AND LOCAL RULE IB 3-1**

**(First Request)**

Plaintiff Alexis Gurshin ("Plaintiff") and Defendant, Bank of America ("Defendant"),  
through their respective undersigned Counsel, hereby stipulate to request this Court for a seven  
(7) day extension (to February 10, 2017) of two filing deadlines:

- Defendant's response to Plaintiff Alexis Gurshin's Objection to Magistrate  
Judge's 1/6/2013 Order (ECF No. 130) Denying Additional Deposition Time for  
FRCP 30(b)(6) Bank Deponent/Designee on Subject No. 6 (Jennifer Miller) (ECF

No. 133); and,

- Plaintiff's response to Defendant Bank of America, N.A.'s Objections to Magistrate Judge's Order on Motion to Deem Requests Admitted [DKT. No. 130] Under Fed. R. Civ. P. 72(A) and Local Rule 1B 3-1 (ECF No. 132)

Under Fed. R. Civ. P. 72(A) and Local Rule 3-1, the deadlines for the parties to file respond to each other's Objections is currently February 3, 2017. The request is being made because:

1. Plaintiff's Counsel has a settlement conference in an unrelated matter, scheduled to convene on the current response deadline of February 3, 2017, which requires substantive preparation and which will interfere with Plaintiff's Counsel's availability to respond to Defendant's filed Objection.
2. Defendant's Counsel has graciously agreed to extend the professional courtesy of an extension requested by Plaintiff's Counsel and to make it mutual.

Respectfully submitted,  
Dated: February 2, 2017  
Gilbert & England Law Firm

Dated: February 2, 2017  
McGuireWoods LLP

By: /s/  
Kathleen J. England  
610 South Ninth Street  
Las Vegas, Nevada 89101-7013  
*Attorneys for Plaintiff,*  
ALEXIS GURSHIN

By: /s/  
Bethany A. Pelliconi, *Pro Hac Vice*  
Lindsay L. Ryan, *Pro Hac Vice*  
1800 Century Park East, 8th Floor  
Los Angeles, California 90067-1501  
*Attorneys for Defendant,*  
BANK OF AMERICA, N.A.

**IT IS SO ORDERED.**

Dated: February 10, 2017

  
UNITED STATES DISTRICT JUDGE

GILBERT & ENGLAND LAW FIRM  
610 SOUTH NINTH STREET  
LAS VEGAS, NEVADA 89101  
(702) 529-2311